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Attorney for Nathan Michael Keays

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

UNITED STATES OF AMERICA,
Plaintiff,

vs.

NATHAN MICHAEL KEAYS,
Defendant.

Case No. 3:20-cr-00085-GMS-MMS-2

UNOPPOSED MOTION TO SEAL ECF NO. 421

The Defendant, Nathan Keays by and through his counsel of record, Allie Wilson, Assistant Federal Public Defender for the District of Nevada, respectfully seeks an order sealing ECF No. 421 (Motion to Dismiss, the “Motion”).

Courts prefer that the public retain access to judicial filings and documents. *See Nixon v. Warner Commc’ns Inc.*, 435 U.S. 589, 597 (1978). However, a party may request sealing of a judicial record by demonstrating “compelling reasons” to prevent public access. *Kamakana v. Honolulu*, 447 F.3d 1172, 1178 (9th Cir. 2006).

Mr. Keays has simultaneously filed an unsealed version of the Motion with redactions. The redactions to the unsealed version of the Motion were agreed upon by the parties following consultation with the government. The redactions comply with the preexisting protective order in this matter filed at ECF No. 349. The Motion, therefore, is available to the public with the exception of the protected information that the motion contains.

Mr. Keays respectfully suggests that sealing the unredacted version of the Motion is appropriate because the Motion contains numerous quotations and references to two documents that are subject to the protective order. *See* ECF No. 349. Those two documents were filed under seal as Exhibits A and B to ECF No. 415. Those two protected documents arose out of a confidential DOJ investigation into its own employees. One is a copy of email correspondence that was drafted in connection with that investigation. The other is a letter describing misconduct findings against one of its employees. The DOJ's internal processes with respect to the implicated attorneys is ongoing, and its findings thus far are not public. To protect the confidentiality of those who participated in or were targeted by the investigation while those processes are ongoing, sealing is appropriate.

Mr. Keays, therefore, respectfully requests leave to file ECF No. 421 under seal.

DATED July 22, 2025.

RENE L. VALLADARES
Federal Public Defender

By: s/ Allie Wilson
ALLIE WILSON
Assistant Federal Public Defender
Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2025, a copy of the foregoing **Motion to Seal ECF No. 421** was served electronically using the district court's CM/ECF system to the following attorneys of record:

Steven Clymer: Steven.D.Clymer@usdoj.gov

Michael Heyman: Michael.Heyman@usdoj.gov

Adam Alexander: Adam.Alexander@usdoj.gov

/s/Katrina Burden
Employee of the Federal Public Defender